

L. PROGRAM OPERATIONS

Overview

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L.1. Confidentiality

Introduction

Local agencies must be aware of the fact that the inappropriate release of WIC information could potentially result in legal proceedings against the State or local agency by the involved applicant or participant. Furthermore, State and local agencies may also be subject to adverse action by Food and Consumer Services for not following Federal program regulations, instructions, and policy. The state WIC program should be consulted, prior to releasing confidential information, whenever the local agency has a question or concern about releasing the information.

What is confidential?

WIC information, whether provided by participant or observed by WIC staff, is protected under the confidentiality provisions of Section 246.26(d) of the WIC Regulations. Examples of observed information include:

- the time and date a participant or applicant was at the WIC clinic, and
 - any aspect of the appearance or apparent condition of persons attending the WIC clinic.
-

Limited disclosure of information

Disclosure of WIC information is limited to:

- Persons directly connected with the administration or enforcement of the program, including persons investigating or prosecuting violations in the WIC program under Federal, State, or local authority. This includes WIC staff and administrators who are responsible for the ongoing conduct of the program operations. It does not include personnel in the State's Health Department who do not have ongoing involvement in the operation or management of the program. Thus, this provision excludes operational personnel not certifying and serving WIC applicants/participants and administrators who do not directly supervise WIC staff.
 - Representatives of the following programs: CHEC, Children with Special Health Care Needs, Well Baby, Infant Development, Baby Your Baby, and the Immunization Program. The state WIC office has signed agreements with these programs allowing sharing of information only for the purposes of establishing the eligibility of WIC participants for health or welfare programs and conducting outreach to WIC participants for such programs.
 - The Comptroller General of the United States for audit and examination authorized by law.
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L.1. Confidentiality, Continued

Use of information release forms

If a signed agreement is not in place, the participant must sign a release form authorizing disclosure. A signed release form provides the local agency with the documentation necessary to show that particular information was released per the participant's request or with his/her approval.

Contacting participants at home

Participants must be informed at each certification visit or when placed on a wait list that the WIC office may contact them via the telephone. If the participant does not wish to be called, enter 9's into the telephone field of screen 102 and enter the correct number in screen 108.

When leaving a message for a participant, do not make reference to WIC.

Participants should also be notified that they may receive a postcard or letter in the mail. They should write their name and address on the postcard or envelope.

Incoming calls for participants

If the clinic receives a telephone call asking to speak to a participant, the staff member should take a name and telephone number and let the caller know that if that person is in the clinic, the message will be delivered. Information acknowledging the person is in the WIC clinic should not be given.

WIC vendors

Participant information may not be released to WIC vendors.

Vendor information (whether it is obtained from the vendor or another source) that identifies the vendor, other than the vendor's name, address and authorization status, is also confidential. Restricted information on a vendor may only be released to:

- Persons directly connected with the administration or enforcement of the WIC Program or the Food Stamps program
 - Persons directly connected with the administration or enforcement of any Federal or State law
 - A vendor that is subject to an adverse action.
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L.1. Confidentiality, Continued

Volunteers

Volunteers are considered part of the WIC program. They may have access to participant information if required by their job assignment. Exercise discretion in screening and selecting capable volunteers who would have access to confidential information. If a potential volunteer does not appear to be a good candidate for keeping information confidential, there may be other activities that the person can perform that would not include access to participant information.

All volunteers must sign an agreement to protect the confidentiality of information. By signing an agreement, the volunteer would agree to keep information confidential or forfeit the volunteer assignment.

Release of information to WIC participants

WIC participants or applicants may ask to see or copy his or her own record, or a parent or guardian may request access to, or a copy of, a child's record. Assuming that any issues regarding custody or guardianship have been settled, such persons have the right to access all information provided by the applicant or participant. However, the local agency need not grant the participant or guardian access to any other information in the file or record, such as documentation of income provided by the third parties or any information which serves as a staff assessment of the participant's condition or behavior, unless required by State or local law or policy.

Release of information for child custody cases and other cases

When WIC records are requested in cases of custody from an individual other than the applicant/participant, or from an organization not covered by an information sharing agreement, it is recommended that local WIC agencies consult with their legal counsel. The attorney can then decide who is the appropriate individual to sign a release, and what procedures to follow with respect to a request or subpoena.

Subpoenas

A subpoena should never be ignored. Failure to respond to a subpoena could result in the local agency being found in contempt of court. This could result in the incarceration of or fines against WIC employees. It is recommended that local WIC agencies consult with their legal counsel in response to any subpoena, and follow the advice of their attorney.

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L.1. Confidentiality, Continued

Reporting of child abuse or neglect

State law requires the reporting of known or suspected child abuse or neglect. WIC staff must release this information to the Office of Family Support. However it is recommended that local WIC agencies consult with their legal counsel prior to releasing any information.

Release of anonymous information

The confidentiality provision does not prohibit the release of information if the information is released in a way that it protects the identity of the individuals. Requests for data in aggregate or summary form may be granted, as long as the released information excludes any items which would identify program participants or applicants.

L.2. Outreach

Minimum requirements

Each local agency is responsible for identifying a referral network that includes all organizations and programs that serve low income pregnant, breastfeeding and postpartum women, infants and children. These grassroots organizations must be contacted yearly and educated about WIC.

All local agencies should make a special emphasis on notifying agencies that work with pregnant women, migrant farmworkers, homeless individuals, foster parents, and protective services about the availability of the WIC program.

All press releases will be written and disseminated by the State WIC office. Upon receipt, local clinics are encouraged to provide the press release to their local newspaper office. Local agencies may also write their own press release.

Required information

All information given to grassroots organization must contain the following information:

- clinic address and telephone number
- clinic hours
- non-discrimination clause

It is also recommended the clinic advertise the availability of evening and/or Saturday appointments.

Documentation

A dated copy of the letter must be kept on file along with a list of all grassroots organizations which were contacted.

A copy of the press release must be kept on file. Include the date the article was printed and/or the date(s) the PSA was aired on the radio/television.

Outreach materials

Outreach materials are available from the state WIC office. These materials should be used by all clinics statewide to ensure the public sees WIC as one uniform program. If the local agency has a need for specific materials, the state office must be contacted prior to developing additional materials.

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L.2. Outreach, Continued

**Additional
outreach
suggestions**

In addition to basic outreach activities, the clinic may choose to promote the WIC program in the following ways:

Target Area	Which may include . . .
Health Care	<ul style="list-style-type: none">• hospitals and doctors offices• inservice hospital staff on WIC• labor and delivery discharge packs• childbirth classes
Internal Outreach	<ul style="list-style-type: none">• Bring a Friend to WIC• Other health department clinic staff (i.e. immunizations, CSHCN, CHEC, etc.)
Social Service Agencies and other Grassroots Organizations	<ul style="list-style-type: none">• Human Services Department• Food Stamps• Medicaid• Daycare Licensing• Child Protective Services• Family Employment Program• Job Service• EFNEP• CAP, Food Banks, Homeless Shelters• gatherings of homeless people• counseling services<ul style="list-style-type: none">• Family Planning• Substance Abuse counseling• Child Abuse counseling• Mental Health• LaLeche League, local lactation consultants, local pump stations• Lions Club, Junior League, Rotary Club
Schools	<ul style="list-style-type: none">• PTA• school lunch• Head Start
Religious organizations	<ul style="list-style-type: none">• any

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L.2. Outreach, Continued

Additional outreach suggestions (continued)

Target Area	Which may include . . .
Businesses	<ul style="list-style-type: none">• any
Meetings	<ul style="list-style-type: none">• health fairs• conferences• county fairs

P&P **comments**

On September 1, all clinics will display the following year's Policy and Procedure manual for public comment for 30 days. All comments will be forwarded to the State WIC Office.

L.3. Caseload Management

Introduction

The WIC program is funded by the Federal government to serve all eligible pregnant, breastfeeding and postpartum women, infants and children under the age of five throughout the nation. In times when funding does not allow all participants to be served by the WIC program, participants may have to be removed from the program. This section will outline the procedure for decreasing caseload.

Philosophy

Caseload reductions must be made as equitable as possible on a statewide basis to ensure participants have equal access to the program throughout the state. Therefore, when reductions are necessary, all clinics must follow the same procedure for removing participants.

When reductions are necessary, applicants with the lowest priority will be the first to be placed on a waiting list. This assures that the participants/applicants at highest nutritional risk will have first access to available benefits.

Caseload reductions

The state WIC office will determine who will be denied WIC benefits during caseload management. This decision will be based on any of the following criteria: priority, nutrition risk factors, category, age and/or income.

Local agencies will be notified, in writing, of the need for wait lists, which priorities are to be placed on the wait list, and the date to implement the list. A local agency may not implement caseload management without written approval.

If participants are to be removed midcert due to caseload management, the state WIC office must contact Food and Consumer Services for prior approval. Local agencies must notify all participants 15 days in advance that they may be removed from the program due to caseload management.

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L.3. Caseload Management, Continued

Wait lists

During caseload management, each local agency must keep a wait list of all individuals who express interest in receiving WIC benefits, either in person or by telephone. Applicants who are placed on a wait list must be notified of their placement on the list within 20 days of their request. A Letter of Ineligibility must be given or mailed to the applicant at this time. Documentation that the letter was given or sent must be made in screen 108.

All wait lists must include the person's name, address, phone number, status, age and date placed on the wait list. In addition, the staff member must explain to applicants why placement on a waiting list is necessary, and what it means in terms of the realistic possibilities of receiving benefits, so that it does not create false expectations on the part of the applicant.

There are two types of wait lists - certified and uncertified. During caseload management, one or both types may be implemented.

- Uncertified wait lists include applicants who are interested in applying for the WIC program but have not been screened. These applicants must be placed on the list based on their highest potential priority (Priority 1 for pregnant and breastfeeding women and infants, Priority 3 for children and Priority 4 for postpartum women.) Uncertified wait lists are manually recorded on the log found in the Forms section of this manual.
- Certified wait lists include applicants who have been certified eligible through screening, but whose priority is not currently being served. Certified wait lists will be created by the UWIN system after the certification information has been entered into the computer. The lists will be grouped by priority.

Participants with a valid VOC who are transferring into the local agency must be placed at the top of the list regardless of priority.

When funds become available, applicants will be served in order of application, based on risk.

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L.3. Caseload Management, Continued

Referrals

During caseload management, all applicants must be referred to other health and social service agencies such as food banks, food stamps, soup kitchens, etc.

**Discontinuing
wait lists**

Discontinuation of wait lists will be the decision of the state WIC office. The decision will be based on the availability of funds. Written notification will be provided to the local agencies with instructions as to the date to discontinue wait lists,

When discontinuing wait lists, applicants on the list are to be contacted in the following manner.

Step	Action
1	Locate the list with the highest priority.
2	Contact the first person on the list, either by letter or telephone, scheduling them for an appointment to determine eligibility. It should be made clear to the applicant that this is only the completion of screening and does not mean that they will automatically be put on the program.
3	Document that notice was given. This information can be placed directly on the wait list.
4	If an attempt is made to contact an applicant by phone and the individual cannot be reached, a follow up letter must be sent to notify the applicant to complete the screening process. Document that the letter was sent in screen 108.
5	Continue through all lists, contacting each person on the list.
6	Applicants who do not respond to notification after 15 days from the date of the letter or phone notice may be crossed off the list. Applicants who miss their appointment may also be crossed off the list.
7	If the applicant is no longer categorically eligible when being removed from the wait list (i.e. child is 5), they should be sent a Letter of Ineligibility. Document the letter was given in screen 108.

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L.3. Caseload Management, Continued

**Certifying wait
list applicants**

Applicants removed from the wait list and responding to the notification of their removal from the list shall complete screening necessary to determine eligibility.

- Check income if data is older than 6 months.
- Collect anthropometric and biochemical data if not taken at time of application, is > 60 days old, or does not reflect current category.
- Complete all required forms including medical and diet history if current form is older than 60 days.

Once an applicant has completed the screening visit and has been determined eligible or ineligible, his/her name may be removed from the wait list.

L.4. Equipment

**Purchase
approval**

The purchase of all clinic equipment must be approved by the state WIC office.

Step	Action
1	Collect at least 2 price quotes from different companies.
2	Write a letter to the State WIC Office. Include the following in the letter: <ul style="list-style-type: none">• brand name of equipment• model number• quantity needed• estimated cost (lower bid price or justification for higher price)• supplier• justification for purchase• where new equipment will be located
3	An approval letter will be sent from the State WIC Office. Keep this letter on file.
4	Order equipment. Add equipment information to inventory file.

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L.4. Equipment, Continued

Approved equipment

The following equipment has been approved by the state WIC office.

Type of Equipment	Model Number	Manufacturer	Description
Adult scale	337	Detecto	Physician's Scale - lbs & kg
	437	Detecto	Physician's Scale - lbs only
	400	Health-O-Meter	Physician's Scale - lbs only
	400KL	Health-O-Meter	Physician's Scale - lbs and kg
	707S	Seca	Digital Scales, waist high reading level, low voltage A/C power, automatic zero Or order the "Scotty the Scale" version (7075)
	751KL	Health-Meter	Digital Scales, waist high reading
Portable adult scale	150	Health-O-Meter	Professional Big Dial Scale - lbs only
	134HT	Health-O-Meter	Portable Scale - lbs only
	770	Seca	Digital Scales, reading is on the floor level , automatic zero
Infant scale	250	Detecto	Balance Beam - lbs only
	450	Detecto	Balance Beam - lbs only
	322	Health-O-Meter	Balance Beam - lbs and kg
	1522KL	Health-O-Meter	Balance Beam - lbs and kg
	1524KL	Health-O-Meter	Balance Beam - lbs and kg
	550KL	Health-O-Meter	Digital Scale - weighs 10 lbs, portable
	552KL	Health-O-Meter	Digital scale
	725	Seca	Digital scale, portable
	734	Seca	Digital scale, portable, detachable tray to weigh small children

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L.4. Equipment, Continued

Approved equipment (continued)

Type of Equipment	Model Number	Manufacturer	Description
Centrifuge	0575	Adams/Becton Dickinson	Autocrit Ultra III
	0668	Adams/Becton Dickinson	Adams Micro-Hematocrit II
	0667	Adams/Becton Dickinson	Micro-Hematocrit II
	0558	Clay Adams	Micro-Hematocrit II - base only
	C-70B	HemataStat II	Separation Technology
	C 602	StatSpin	CritSpin II
Recumbent length board	PE-RILB-122-AC	Perspective Enterprises	Oak board with acrylic head and foot pieces
	PE-RILB-122-PC	Perspective Enterprises	Oak board with polycarbonate head and foot pieces
	416	Seca	Oak board with polycarbonate head and foot piece
	418	Seca	Oak board with ball bearing mounted foot piece
	417	HealthQuest	Hardwood with aluminum insert
Stature measuring board	PE-WM-60-76-AC	Perspective Enterprises	Oak board with acrylic head piece
	PE-WM-60-76-PC	Perspective Enterprises	Oak board with polycarbonate head piece
	223	HealthQuest	Wall-mounted wood stadiometer
	216	HealthQuest	Wallmount

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L.4. Equipment, Continued

Approved equipment (continued)

Type of Equipment	Model Number	Manufacturer	Description
Portable adult/infant length/stature	PE-AIM-101	Perspective Enterprises	Free standing
	420	Seca	Collapsible, free standing, with shoulder strap

Continued on next page

L.4. Equipment, Continued

Medical Supply Companies Following is a list of suggested suppliers.

Company	Products
Accurate Weighing System 1000 West 14660 South Bluffdale, UT 84065 572-2266	<ul style="list-style-type: none">• Scale repair
Diagnostic Marketing, Inc. 585 West 3900 South, Suite #10 Murray, UT 84123 266-3510	<ul style="list-style-type: none">• Microhematocrit• Tube reader
Durr-Fillauer Medical 4080 South 500 West Murray, UT 84123 263-3728	<ul style="list-style-type: none">• Scales• Measuring boards• Centrifuges• Whole blood controls• Scale repair
HealthQuest, Inc. P.O. Box 3410 Cuyahoga Falls, OH 44223 1-800-497-3932	<ul style="list-style-type: none">• Scales• Accuplot• Head circumference tapes• Whole blood controls• Centrifuges• Measuring boards
Hematronix, Inc. 524 Stone Road Benicia, CA 94510 1-800-543-3933	<ul style="list-style-type: none">• Whole blood controls
Hycor Biomedical Inc. 18800 Von Karman Avenue Irvine, CA 92612 1-800-382-2527	<ul style="list-style-type: none">• Whole blood controls
Intermountain Biomedical 9460 South 537 West Sandy, UT 84070 565-8171	<ul style="list-style-type: none">• Scale repair

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L.4. Equipment, Continued

Medical Supply Companies (continued)

Company	Products
Perspective Enterprises 7829 Sprinkle Road Kalamazoo, MI 49001 1-800-323-7452	<ul style="list-style-type: none">• Measuring boards• Scales• Replacement parts• Centrifuges• Circumference measuring tapes• Accuplot
Physician Sales & Service 3860 Revere St., Suite D Denver, CO 80239 1-303-373-1885	<ul style="list-style-type: none">• Scales• Centrifuges
Physician's Supply Company 2650 South 1030 West Salt Lake City, UT 84126 973-7991	<ul style="list-style-type: none">• Scales• Centrifuges• Whole blood controls• Miscellaneous items• Equipment repair
Separation Technology, Inc. 1096 Rainer Drive Altamonte Springs, FL 32714 1-800-777-6668	<ul style="list-style-type: none">• Hematastat II• Whole blood controls
Tolin Medical Supply Company 4555 South 300 West #500 Murray, UT 84107 263-3738	<ul style="list-style-type: none">• Scales• Centrifuges• Miscellaneous items

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L.4. Equipment, Continued

**Equipment
criteria**

The following criteria should be considered in evaluating the safety, practicality, and accuracy of equipment.

Equipment	Criteria
Infant scale - mechanical	<ul style="list-style-type: none">• balance beam scale with tray• non-detachable, free-sliding weights• zeroing mechanism (screw type)• can be read easily• records to 1/2 oz or 10 gm• can be cleaned easily• no sharp edges on tray
Infant scale - digital	<ul style="list-style-type: none">• durable, sensitive, accurate and reliable• automatically zero in between weights• can be read easily• records to 1/2 oz or 10 gm• can be cleaned easily• no sharp edges on tray
Adult scales - mechanical	<ul style="list-style-type: none">• upright platform beam balance• non-detachable, free-sliding weights• zeroing mechanism (screw type)• records to 1/4 lb. or 0.1 kg• can be easily read• sturdy and functional
Adult scales - digital	<ul style="list-style-type: none">• durable, sensitive, accurate and reliable• automatically zeroes in between weights• records to 1/4 lb. or 0.1 kg• can be easily read• sturdy and functional

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L.4. Equipment, Continued

Equipment criteria (continued)

Equipment	Criteria
Infant length measuring board	<ul style="list-style-type: none">• rigid headboard• movable foot board• measuring device marked to 1/8 inch• no sharp edges or unfinished parts• no loose joints• sturdy and functional• easily cleaned• measurements can easily be read• device can be calibrated
Adult height measuring board	<ul style="list-style-type: none">• measuring device readable to 1/8 inch• measuring device perpendicular to floor• measuring device securely attached to wall• durable and easy to clean• no sharp edges or unfinished parts• measurements can be easily read• movable headboard at least 6 inches wide• measuring device cannot be stretched• device can be calibrated

L.5. Inventory

Identification Tags

All equipment and office furniture purchased by the WIC program must be tagged with a permanent ID number. This should include but is not limited to:

- desks, chairs, filing cabinets, computers, and printers
 - scales, measuring boards, and centrifuges
-

Documentation

The clinic must keep a list of all equipment and office furniture purchased by the WIC program. This list must contain the following information for each purchase:

- description
- serial number or ID number
- where the equipment was purchased
- date of purchase
- cost
- location, use, and condition
- percentage of federal participation in the cost
- who holds the title
- date of disposal and sale price (if applicable)

A sample form may be found in the Forms Section of this manual.

Disposal of property

All office furniture and equipment purchased with WIC funds remains the property of the federal government. Call the State WIC office prior to disposing of any equipment or furniture.

L.6. Retention of Files

Retention periods

WIC files must be kept for Federal or State auditors' review for the following length of time.

File	Time Period
Women	4 years following the end of the fiscal year when their files were closed.
Infants & Children	End of the fiscal year of their 10th birthday.
All other files and reports	4 years following the date of submission

How to destroy files

- Specific procedures must be followed prior to destroying any WIC files. Disposal of records at a dumpsite is not an acceptable method of destruction.
- Shredding or burning are acceptable methods of destruction.

Step	Action
1	Write a letter to the state office listing all files you wish to destroy and how you plan to destroy them. Keep a clinic copy.
2	Receive a written response from the state office approving destruction of files. File the letter with your request.
3	Destroy files. All destruction must be witnessed by two staff members.

L.7. Financial Management

**In this
subsection**

The following topics are included in this subsection.

Topic	See Page
L.7.1 Program Costs	24
L.7.2 Administrative Reimbursements	28
L.7.3 Local Administrative Formula	29
L.7.4 Summary Statement of Expenditures	30
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L.7.9 Detail Statement of Current Expenditures	35
L.7.10 Detail Statement of Capital Outlay	36

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L.7.1. Program Costs

Food costs

Food costs are the cost of food purchased with vouchers issued to certified WIC participants from local WIC clinics. Food costs shall not exceed the food vendor's customary sale price of the supplemental food commodities.

Funds for food costs are deposited into the state WIC voucher account in amounts sufficient to operate the statewide program.

The maximum amount of food funds provided to each local agency is outlined in the agencies' WIC contracts and on the monthly WIC financial statements. This maximum is to be used in determining the optimal caseload in each agency.

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L.7.1 Program Costs, Continued

Administrative costs

The state will reimburse local agencies for allowable operational and administrative costs up to but not exceeding the grant for administrative funds. This grant amount is determined by the Local Agency Administrative Formula (see page 28 of this section) and is specified in the contract. Reimbursement will be processed upon receipt of a claim for reimbursement from the local agencies for expenditure as made in the operation and administration of the program. Of these administrative allowable expenses at least 1/6 must be spent on Nutrition Education activities.

The following are allowable administrative costs:

Activity	Which includes . . .
Administering the food delivery system	
Certification procedures	<ul style="list-style-type: none">• Laboratory fees incurred for tests conducted to determine nutritional risk• Expendable medical supplies used to determine nutrition risk• Medical equipment used, such as<ul style="list-style-type: none">• scales• measuring boards• centrifuges• Salary and other costs for time spent on certification
Outreach services	
Translators for materials and interpreters	
Fair Hearings	<ul style="list-style-type: none">• independent medical assessment of the appellant, if necessary
Monitoring and reviewing program operations	
Breastfeeding aids	

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L.7.1. Program Costs, Continued

Administrative costs (continued)

Activity	Which includes . . .
Nutrition Education <ul style="list-style-type: none">• must spend at least 1/6 of all administrative funds in this area	<ul style="list-style-type: none">• Salary and other costs for time spent on nutrition education consultations• Buying and producing nutrition education materials. These include:<ul style="list-style-type: none">• handouts• flip charts• food models• audiovisuals• other teaching helps• nutrition education mailings• Training nutrition educators, including:<ul style="list-style-type: none">• costs related to conducting training sessions• purchasing and producing training materials• Conducting evaluations of nutrition education• Salary and other costs incurred in developing the nutrition education plans• Monitoring nutrition education

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L.7.1. Program Costs, Continued

The following are also allowable administrative costs with prior approval from the state WIC office.

Activity	Special notes . . .
Transportation of rural participants	<ul style="list-style-type: none">• Must be considered essential to assure program access.• Direct reimbursement to participants for transportation is not allowed.
Computer equipment and software	<ul style="list-style-type: none">• Must be required by state or local agency.• Approval shall be granted by USDA.• Does not include general management and payroll, including acquisition of automatic data processing hardware or software.
Capital expenditures over \$1,000.00 (purchases over \$5,000.00 must be approved by USDA)	<p>This includes:</p> <ul style="list-style-type: none">• cost of facilities• equipment• other capital assets• any repairs that materially increase the value of useful life of capital assets.
Management studies	<ul style="list-style-type: none">• Performed by agencies or departments other than WIC, or• outside consultants under contract with WIC.
Travel	<ul style="list-style-type: none">• Out of state travel only.

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L.7.2. Administrative Reimbursements

Requirements	All operational and administrative costs are subject to the terms of the WIC contract and Federal Management Circulars A-87, 7CRF Part 3016 and other guidelines followed by the Utah Department of Health and local agencies.
Documentation	All expenditures claimed on the reimbursement form should have appropriate time and attendance documentation for the claims. The local agencies must have a system for documenting the time spent on the program and this system will be monitored every year as part of the monitoring visit from the state office. Also, regular audits will be performed to assure proper classification, documentation and reimbursement.
Local Agency budget	Each local WIC agency has a maximum operational and administrative budget, which is specified in the WIC contract. Any questions or problems regarding the budget should be addressed to the state WIC office.
Expenditure report	<p>The approved invoice to be used for the reimbursement is the State Health Department Monthly Expenditure Report. The claim for reimbursement contained on this report should cover a specific calendar month.</p> <p>There must be at least three separate columns filled in for the WIC Program for Administrative Expenditures on the monthly expenditure report:</p> <ul style="list-style-type: none">• WIC Nutrition Education• WIC General Expenditures• WIC Breastfeeding

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L.7.3. Local Administrative Formula

Introduction

The local WIC Administrative Task Force developed and approved a formula for the allocation of local administrative funds for the WIC Program in Utah. These funds will be allocated to local WIC agencies who are currently functioning as providers of WIC services, with some funds reserved for potential agencies.

The result of this Task Force was a recommended formula which includes several factors:

- Urban Grant
- Rural Grant
- Reallocation of Funds
- New Clinic Start-up funds.

These factors will be used in determining the funding for local agencies. The formula and its component factors are described below.

Funding formula

Funding is allocated according to the formula below:

	This includes	They receive
Urban Grant	Local agencies located along the Wasatch Front	\$7.15 per participant per month, based on their certified caseload.
Rural Grant	All other local agencies	\$9.75 per participant per month, based on their certified caseload.

Reallocation of funds

If an agency does not spend 95% of its food grant and/or administrative grant, the state agency can exercise the option to reduce the grant to a realistic caseload target for the next year or next quarter.

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L.7.4. Summary Statement of Expenditures

Start-up funds Funds will be provided to any new agency in sufficient quantity to successfully begin operation of a WIC program for 3 months of operation or until the local agency reaches its projected caseload level, whichever comes first. This may include any funds needed to be advanced to the qualifying agency. The amount of the start-up grant will be determined from the local agency's application and the availability of local administrative funds.

Source Take the total expenditures allocated to each program from each of the following statements:

- Detail Statement of Wages and Salaries
- Detail Statement of Fringe Benefits
- Detail Statement of Travel Expenditures
- Detail Statement of Current Expenditures
- Detail Statement of Capital Outlay

Step	Action
1	From each of the detail statements listed above, enter the total expenditures for each program, and the total expenditures for all programs for each expenditure category contained on the Summary Statement of Expenditures.
2	Complete the total expenditure line and verify that the total expenditures for each program are equal to total expenditures for all programs.
3	Collections which are a reimbursement of program expenditures should be determined from a review of the local department's cash receipts journal or its equivalent. The collection amount should be entered under the applicable program heading.
4	New expenditures for each program are determined by deducting collections from total expenditures.
5	All completed detail statements and the summary statement should then be reviewed and the certification section completed.

Continued on next page

L.7.5. Statement of Wages and Salaries Certification

Definition	Compensation follows and appointments made according to State and local government laws and rules which meet Federal merit system or other requirements.
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Source	Employee personnel files, payroll registers, and/or time and attendance records.
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Preparation	<p>The following items are to be completed from the above sources:</p> <ul style="list-style-type: none">• employee name• employee classification• grade and step• percent of time employed• rate (monthly or hourly)• gross wages and salaries. <p>Note: The total gross wages and salaries for each employee per the Detail Statement of Wages and Salaries Certification must equal the total gross wages and salaries for each employee per the Detail Statement of Wages and Salaries.</p>
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L.7.6. Detail Statement of Wages and Salaries

Definition	Compensation for personal services rendered during the period of performance. Compensation follows and appointments made according to State and local government laws and rules which meets Federal merit system or other requirements. Wages and salaries charged to the programs will be based on payrolls documented and approved in accordance with the generally accepted practice of the state or local agency. Payrolls must be supported by time and attendance or equivalent records for individual employees. The wages and salaries of employees chargeable to more than one program will be supported by appropriate time distribution records.
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Source	Payroll registers and/or time and attendance records.
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Preparation	<p>The following items should be completed from the above sources:</p> <ul style="list-style-type: none">• programs to which wages and salaries will be allocated• employee name• amount allocated to each program for each employee• total allocated for each employee• total allocated for each program• total allocated to all programs• The noncontract expenditure designation will be used to accumulate expenditures allocated to programs not covered by Utah Department of Health Contracts.
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L.7.7. Detail Statement of Fringe Benefits

Definition	Employee benefits in the form of employers' contribution or expenses for social security, employees' life and health insurance plans, unemployment insurance coverage, workman's compensation insurance, pension plans, and the like, provided such benefits are granted under approved plans and are distributed equitably to all related programs.
Source	The payroll register and reports required for the reporting of fringe benefits to the various governmental agencies and private insurance companies.
Preparation	<p>Determine the percentage of wages and salaries allocated to each program per the total line on the Detail Statement of Wages and Salaries. The following items are to be completed from the above sources and calculated percentages:</p> <ul style="list-style-type: none">• programs to which fringe benefits will be allocated• the amount of fringe benefits by type allocated to each program based on the percentage of wages and salaries allocated to that program• total allocated by fringe benefit type• total allocated for each program• total allocated to all programs• The noncontract expenditure designation will be used to accumulate expenditures allocated to programs not covered by Utah Department of Health Contracts.

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L.7.8. Detail Statements of Travel Expenditures

Definition	<p>Expenditures for transportation, lodging subsistence, and related items incurred by employees who are in travel status on official business incident to a program. Such costs may be charged:</p> <ul style="list-style-type: none">• on an actual basis• on a per diem or mileage basis in lieu of actual costs incurred,• or on a combination of the two,<ul style="list-style-type: none">• provided the method used is applied to an entire trip, and• results in charges consistent with those normally allowed in like circumstances in non program sponsored activities.
Source	<p>The check register or equivalent and the travel claim prepared by each employee.</p>
Preparation	<p>The following items are to be completed from the above sources:</p> <ul style="list-style-type: none">• programs to which travel expenditures will be allocated• expenditure category or payee• amount allocated to each program for each entry• total allocated for each entry• total allocated for each program• Total allocated for all programs• the noncontract expenditure designation will be used to accumulate expenditures allocated to programs not covered by Utah Department of Health Contracts.
Out of state travel approval	<p>All out of state travel must have prior written approval from the State WIC Director.</p>

Continued on next page

L.7.9. Detail Statement of Current Expenditures

Definition All expenditures necessary for the operation of the program that are not properly classified as wages and salaries, fringe benefits, travel, or capital outlay.

Examples include: utilities, supplies, contracted services, maintenance, etc.

Source The check register or equivalent and the vendor billing or invoice.

Preparation The following items are to be completed from the above sources:

- programs to which current expenditures will be allocated
- expenditure category or payee
- amount allocated to each program for each entry
- total allocated for each entry
- total allocated for each program
- total allocated for all programs
- The noncontract expenditure designation will be used to accumulated expenditures allocated to programs not covered by Utah Department of Health Contracts.

Continued on next page

L.7.10. Detail Statement of Capital Outlay

Definition	The cost of facilities, equipment, other capital assets, and repairs which materially increase the value or useful life of capital assets. Property having a useful life of more than one year and an acquisition cost of \$1000 or more per unit (unless otherwise specified). Prior approval from the state WIC office is needed for capital equipment, computer equipment and some other items specified in the local agency contract.
Source	The check register or equivalent and the vendor billing or invoice.
Preparation	<p>The following items are to be completed from the above sources:</p> <ul style="list-style-type: none">• programs to which capital outlay expenditures will be allocated• expenditure category or payee• amount allocated to each program for each entry• total allocated for each entry• total allocated for each program• total allocated for all programs• The noncontract expenditure designation will be used to accumulate expenditures allocated to programs not covered by Utah Department of Health Contracts.

L.8. Reporting

Introduction

Each year, the State WIC office is required to submit data to USDA. The following reports as submitted as described below.

Form FNS-191

The “Racial/Ethnic Group Participation” report is prepared by the State using April data and is submitted to USDA in September of each fiscal year. The computer report used to gather this information is the WIC Participant Report WICP3010.

Form FNS-654

The “Report of Participation by Priority” report is prepared by the State. This report is prepared once a year using the average number of persons participating in the program by category and priority level and the average number of migrant farmworker household members participation in the program for the most recent 12 month period beginning in July and ending in June.

The information for this report comes from the Participation by Priority Report WICP3001.

L.9. Civil Rights

Policy

Program benefits are made available to all eligible persons without discrimination based on race, color, national origin, age, sex, or handicap.

Public notification

Each local agency shall take positive and specific actions to implement a public notification program throughout its jurisdiction which informs participants and applicants, particularly minorities, of their program rights and responsibilities, their protection against discrimination, and the procedure for filing a complaint. This includes:

- Displaying the nondiscrimination poster, “And Justice For All,” in prominent places, such as clinic waiting rooms and other areas frequented by participants and applicants.
 - Ensuring that appropriate staff, volunteers or other translation resources are available to serve participants and applicants.
 - Making available program regulations and guidelines to the public upon request.
 - Upon initial visits, giving applicants specific program information which is pertinent to their participation in the program.
 - Providing participants and applicants access to civil rights information. This information includes procedures for filing complaints, program specifics, and rights and responsibilities of participants and applicants.
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Data collection

Visual identification shall be used to determine a participant’s racial/ethnic category. For reporting purposes, a participant may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. Participants may be asked to self-identify their racial group only after it has been explained. Participants need to understand that the collection of this information is strictly for statistical reporting requirements and has no effect on the determination of their eligibility to participate in the program.

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L.9. Civil Rights, Continued

**Pre-award
compliance
reviews**

The State Agency will perform thorough reviews of applicants from previously unfunded local agencies. This review will be based on information provided by applicants in their official application for program funds. Those agencies whose applicants are determined incomplete shall be notified by the State Office within 15 days of receipt of the application. This notification will specify the additional information needed to complete the application. The applicant shall then be notified of the approval or denial of his/her application within 30 days of receipt of the completed application. On-site reviews to determine civil rights compliance shall be made if the State agency cannot determine compliance based on the information contained in the completed application. The review will include the following:

- All past substantiated civil rights problems or noncompliance situations have been corrected.
- The local agency will operate within the procedures established by the State Agency.
- Clinic sites do not deny access to any persons because of his or her race, color, national origin, age, sex, or disability.
- Appropriate staff, volunteers or other translation resources are available in areas where a significant proportion of non-English or limited English- speaking persons resides.
- Description of the racial/ethnic make-up of the service area is included in the application.

**Local agency
reviews**

When a review of agency is performed, the following items must be determined as a minimum:

- Do all persons have an equal opportunity to participate in the program regardless of race, color, national origin, age, sex, or disability?
- Is the ethnic code recorded in screen 102 for all participants?
- Has the local agency conducted civil rights training for all staff?
- Is the nondiscrimination poster displayed in the clinic?
- Is program information being provided to applicants, participants, grassroots organization or similar minority groups?
- Is the nondiscrimination statement being included on all printed materials distributed to the public?
- Are civil rights complaints being handled according to policy?

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L.9. Civil Rights, Continued

Training

All staff members must complete Civil Rights training yearly. This may consist of reading the Civil Rights module and completing the post-test or attending a group training session. If a group training session is utilized, the local agency will retain on file an outline which must cover the following topics:

- Collection and using racial/ethnic data
- Effective public notification systems
- Complaint procedures
- Review techniques, and
- Resolution of non-compliance, including development of an action plan.

In addition, a documented objective method or instrument must be utilized to measure knowledge retention and kept on file.

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L.9. Civil Rights, Continued

Complaints of discrimination

Any persons alleging discrimination based on race, color, national origin, sex, age or disability has a right to file a complaint within 180 days of the alleged discriminatory action.

All civil rights complaints, written or verbal, shall be accepted and forwarded to the State WIC office or the Regional office in Denver as appropriate. Anonymous complaints shall be handled as any other complaint.

In the event a complainant makes the allegations verbally or through a telephone conversation and refuses or is not inclined to place such allegations in writing, the person to who the allegations are made shall write up the elements of the complaint for the complainant. Every effort shall be made to have the complainant provide the following information:

- Name, address, and telephone number of the complainant, or other means of contacting the complainant
- The specific location and name of the entity delivering the service or benefit
- The nature of the incident or action that led the complainant to feel discrimination was a factor, or an example of the method of administration which is alleged to have a discriminatory effect on the public or potential and actual participants
- The basis on which the complainant feels discrimination exists (race, color, national origin, age, sex or disability)
- The names, titles, and business addresses of persons who may have knowledge of the discriminatory action
- The date during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions

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L.9. Civil Rights, Continued

Non-discrimination clause

The following nondiscrimination statement must appear on all materials that identify or describe the WIC Program.

In accordance with Federal law and U.S. Department of Agriculture policy this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Ave, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider.

However, when space is limited, print **“The USDA is an equal opportunity provider”** in its place. This statement should be in print size no smaller than the text of the document.

When providing information for radio and television public service announcements, the nondiscrimination statement does not have to be read in its entirety. Rather, a statement such as **“WIC is an equal opportunity provider”** is sufficient to meet the nondiscrimination requirement.

The statements should be in English and in languages appropriate to the local population, and in alternative means of communication (Braille, large print, audiotape, etc.)

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L.9. Civil Rights, Continued

**Non-
discrimination
clause**
(Continued)

The nondiscrimination statement is required if the material:

- Describes eligibility requirements of the WIC Program
- Identifies the benefits of WIC participation
- Describes participation for WIC participation
- Provides notice of conditions to continue eligibility
- Provides notice of ineligibility or disqualification.

Nutrition education and breastfeeding promotion and support materials that strictly provide a nutrition message with no mention of WIC are not required to contain the nondiscrimination statement.
